

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

|                                     |   |                                    |
|-------------------------------------|---|------------------------------------|
| IN RE:                              | ) | Case No.: 16-61478                 |
|                                     | ) |                                    |
| JENNIFER E. LEWIS,                  | ) | Adversary Proceeding No. 19-06059  |
|                                     | ) |                                    |
| Debtor,                             | ) | Chapter 13                         |
|                                     | ) |                                    |
|                                     | ) | Judge Russ Kendig                  |
|                                     | ) |                                    |
| JENNIFER E. LEWIS,                  | ) |                                    |
|                                     | ) |                                    |
| Plaintiff,                          | ) |                                    |
|                                     | ) |                                    |
| v.                                  | ) | <u>UNITED STATES DEPARTMENT OF</u> |
|                                     | ) | <u>EDUCATION'S MOTION FOR</u>      |
|                                     | ) | <u>SUMMARY JUDGMENT</u>            |
| JOHNSON & WALES UNIVERSITY, et al., | ) |                                    |
|                                     | ) |                                    |
| Defendant.                          | ) |                                    |

Now comes the United States Department of Education, by and through Bridget M. Brennan, Acting U.S. Attorney for the Northern District of Ohio, and Rema Ina, Assistant United States Attorney, pursuant to Federal Rule of Civil Procedure 56(a), applicable to this case pursuant to Federal Rule of Bankruptcy Procedure 7056, and hereby moves the Court for summary judgment.

The grounds in support of this motion are set forth in the attached memorandum in support.

Respectfully submitted,

BRIDGET M. BRENNAN  
Acting United States Attorney

By: /s/ Rema A. Ina  
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CERTIFICATE OF SERVICE

I hereby certify that on, March 1, 2021, a true and correct copy of the foregoing *United States Department of Education's Motion for Summary Judgment*, was filed electronically and was served via the court's Electronic Case Filing System on the U.S. Trustee and these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Nicole L. Rohr-Metzger, Esq., on behalf of Plaintiff Jennifer Ellen Lewis, at

[nicole@thrushandrohr.com](mailto:nicole@thrushandrohr.com)

Milos Gvodenovic, Esq., on behalf of Defendant National Collegiate Student Loan Trusts, at

[mgvozenovic@weltman.com](mailto:mgvozenovic@weltman.com)

J. Robert Linneman, Esq., on behalf of American Education Services, at [jrl@santenhughes.com](mailto:jrl@santenhughes.com)

Rema Ina on behalf of Creditor U.S Department of Education at [rema.ina@usdoj.gov](mailto:rema.ina@usdoj.gov)

I further certify that, on March 1, 2021, or on the next business day thereafter, a copy of the foregoing Motion was served by regular U.S. mail, postage prepaid, to:

Defendant AES/Bank of America, P.O. Box 2461, Harrisburg, PA 17102

Defendant Bank of America, c/o CT Corporation System, 1300 E. 9th St., Ste. 1010, Cleveland, OH 44114

Defendant JPMorgan Chase Bank, c/o CT Corporation System, 4400 Easton Commons Way, Suite 125, Columbus, OH 43219

Defendant Johnson & Wales University, 8 Abbott Park Place, Providence, RI 02886

Defendant National Collegiate Student Loan Trust 2003-1, 7595 Montevideo Rd., Jessup, MD 20794

Defendant Rhode Island Student Loan Authority, 935 Jefferson Blvd. #3000, Warwick, RI 02886

/s/ Rema A. Ina

Rema A. Ina (0082549)

Assistant United States Attorney